

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

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BUILDING 2 HOLDING CO. LLC and
ON GRID INFRASTRUCTURE SERVICES, LLC

Plaintiffs,

-against-

Civil Action No.: 1:22-cv-360
(MAD/CFH)

WILLIAM R. DICKERSON, III,

Defendant.
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STIPULATION AND ORDER ON CONSENT TO PRELIMINARY INJUNCTION

Plaintiffs, Building 2 Holding Co. LLC (“B2HC”) and On Grid Infrastructure Services, LLC (“On Grid”), filed a Complaint against Defendant, William R. Dickerson, III (“Dickerson”), on April 18, 2022, and filed a Motion for Temporary Restraining Order and Preliminary Injunction and a Motion for Expedited Discovery on April 20, 2022.

Thereafter, the Parties, on consent, reached an agreement to a Preliminary Injunction as outlined below. Accordingly, it is STIPULATED AND AGREED to by the Parties as follows:

- (1) Dickerson is enjoined from competing against Plaintiffs;
- (2) Dickerson is enjoined from helping any third party compete against Plaintiffs;
- (3) Dickerson is enjoined from soliciting any of Plaintiffs’ employees, contractors, vendors, customers or prospective customers;
- (4) Dickerson is enjoined from using, accessing, or disclosing any document or information containing or derived from Plaintiffs’ confidential information, trade secrets or property except as set forth herein;
- (5) The Parties, including their principals, corporate members and owners, are enjoined from disparaging one another or anyone affiliated with each other;
- (6) Dickerson is enjoined from interfering with Plaintiffs’ business operations;

- (7) Nothing set forth herein shall preclude or limit Dickerson's rights as a 49% owner of B2HC.
- (8) The Parties shall take all affirmative steps to ensure the protection and preservation of Plaintiffs' information and all information relevant to this lawsuit.
- (9) Notwithstanding the foregoing, the Parties shall not be prevented from acting in good faith to prosecute or defend any claims asserted in this action, including but not limited to, filing counterclaims and/or third-party claims.
- (10) This Order will remain in effect for the pendency of this lawsuit in the United States District Court for the Northern District of New York or until such time as the Court directs or the Parties otherwise agree.
- (11) Plaintiffs have agreed to withdraw their pending motions before the Court (Docket Nos. 5, 6 and 7).
- (12) The time for Dickerson to answer, move against, or otherwise respond to the Complaint in this lawsuit shall be 45 days from the date of this Order.
- (13) Electronic service of this Order, along with the Summons and Complaint, to Dickerson and his attorney, Stuart Klein, at wrdthree@gmail.com and kleins@bsk.com by April, 27, _____, 2022, and proof of such service filed with the Court, shall be deemed good and sufficient service.

SO ORDERED, this 25th day of April, 2022


Mac A. D'Agostino
United States District Court Judge

CONSENTED TO:

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